

1 Q In other words pages one through 23 are largely
2 your work?

3 A Yes.

4 Q And who else, if anyone, was involved in the
5 writing of this document?

6 A Me.

7 Q Was there anybody, so far as you know, who edited
8 the document?

9 A Deirdre Kennedy looked the document over and
10 helped edit it, yes.

11 Q Was there anybody else who had any role in editing
12 the document?

13 A We had help from an attorney who looked it over
14 and gave me advice in terms of arguments that I was making,
15 whether they sounded silly or not, but the attorney had
16 nothing to do with the content of the document.

17 Q Was there just one attorney or more than one
18 attorney?

19 A Just one.

20 Q And who was that?

21 A That was Alan Corne.

22 Q So, Mr. Corne looked at the Petition to Deny at
23 some point before it was filed?

24 A Yes.

25 Q Did he make any suggestions that you took and then

1 you changed the document as a consequence?

2 A Suggestions in terms of how I worded arguments,
3 but no suggestions in terms of content.

4 Q Did Mr. Corne look at the various exhibits that
5 were included as part of the petition?

6 A No, he did not.

7 Q Now, we've talked already about Exhibit A, so we
8 know what Exhibit A is to the Petition to Deny. What is
9 Exhibit B, so far as you know?

10 A This is the affidavit of Michael Johnson, he was
11 an employee at KALW.

12 Q And how is it that a declaration or affidavit came
13 to be prepared for Mr. Johnson or by Mr. Johnson, maybe you
14 could help me there in terms of whether it was for or by?

15 A Right. Michael Johnson, as well as a number --
16 one thing that's interesting to note, before I tell you
17 about this, is a majority of the people who worked at KALW
18 supported this petition. So, when people at the radio
19 station heard that there was a Petition to Deny the license,
20 there were, you know, they wanted to be involved in some
21 way. There were other people we didn't get -- you know, now
22 that I think about it we should have gotten affidavits of
23 others who, you know, we didn't get them at the time.

24 Q We're all geniuses in hindsight.

25 A So, we could have shown there was even a bigger

1 groundswell than there was. But, that was part of it,
2 Michael Johnson heard that we were doing this and that EEO
3 was an issue that we were taking up. And one of his issues
4 at the Golden Gate Public Radio was that he felt that he had
5 been passed up for promotions, and I shouldn't put words in
6 his mouth but, my understanding was not necessarily because
7 he was Black, but because there wasn't a functioning EEO
8 policy he could not take advantage of what should have been
9 in existence, so that he could have been considered for jobs
10 that came up, you know, for advancement at the radio
11 station.

12 Q So, that's your understanding as to why he became
13 involved in this petition?

14 A Right, because he had personal experience with the
15 lack of an EEO policy at the radio station.

16 Q Do you know who it was who drafted Mr. Johnson's
17 affidavit?

18 A I don't know. He may have written it himself.

19 Q In other words, in response to my question, you
20 don't know who drafted it?

21 A I don't know.

22 Q So, it would be fair to say you did not draft it?

23 A I don't recall, I may have helped.

24 Q In other words you may have?

25 A I may have helped draft it, but I don't recall. I

1 mean I wouldn't have known any of this information and I'm
2 almost positive that he would have written this himself,
3 knowing Michael Johnson, he wouldn't have wanted someone
4 else to write something that he was going to sign as an
5 affidavit.

6 Q So, you don't have any current recollection that
7 you were the drafter of this document?

8 A I actually don't, no, I actually don't recall.

9 Q Now, Exhibit C purports to be an affidavit of Dave
10 Evans. Do you have any knowledge as to whether or not Dave
11 Evans drafted this document?

12 A He drafted that document, I know that for a fact.

13 Q You did not?

14 A I did not. He insisted on that wording exactly
15 the way he wanted it, it sounds very colloquial.

16 Q Now, in terms of Susan Hecht, when we come to
17 Exhibit D, do you have any knowledge as to how drafted
18 Exhibit D?

19 A Again, I don't recall. I may have, she may have
20 given me the basis for it and I may have, you know, wrote
21 the finished thing and then she looked at it and signed it,
22 that's how it may have been, I don't recall.

23 Q One oddity that has struck me here is the spelling
24 of Susean. Is that how she spelled her name, S-u-s-e-an?

25 A I believe so, yes.

1 Q Well, there's a first time for everything. Now we
2 come to Exhibit F and it purports to be the affidavit of Mel
3 Baker. Do you know who it was that drafted Exhibit F of the
4 Petition to Deny?

5 A I believe Mel wrote that.

6 Q Is it one of these situations where you may have
7 assisted?

8 A I don't think so. Mel is a writer, so I would
9 imagine that Mel would have written it.

10 Q Do you need to take a break?

11 A No. I was just looking -- I have to actually move
12 my car at 4:00 o'clock.

13 Q Oh, okay. Well, we're good for awhile.

14 A Yeah, we're good for awhile. I was hoping it
15 wasn't like 3:30.

16 Q Okay. Now, we come to Exhibit G, it has 11 pages,
17 it says 'Annual Financial Report', could you tell me what
18 this document represents?

19 A This is a report that radio stations have to
20 prepare for the Corporation for Public Broadcasting in order
21 to get CSG Funding, I can't remember what CSG stands for,
22 and one other supplemental funding that they get from the
23 Corporation for Public Broadcasting. They have to show that
24 a certain amount of hours are locally produced, they have so
25 many full time employees, and other requirements. And they

1 have to show their annual financial report so that CBB can
2 then award them the money.

3 Q And do you have any knowledge as to how it was
4 this document came to be included in the Petition to Deny?

5 A That document, I believe -- there are a number of
6 documents in here that were provided by Dave Evans, he had
7 keys and access and, you know, that sort of thing, and he
8 had authority, you know, for that kind of access.

9 Q Or at least you understood that he did?

10 A Or at least I understood that he did, yeah. So, I
11 believe this was provided by Dave Evans.

12 Q Now, we come to Exhibit H of the Petition to Deny,
13 it says 'Affidavit of Joanne Mar'. Did you have any role in
14 drafting this document?

15 A Again, I don't recall but I don't believe so, no.

16 Q And why would you believe that you had no such
17 role?

18 A Joanne is an attorney.

19 Q Oh. We're all jealous of our prerogatives when it
20 comes to writing. Okay. And what is Exhibit J?

21 A Exhibit J is an add for employment. We included
22 it in here, I believe, I haven't seen this for awhile, I
23 believe because there's no mention of an EEO policy in this
24 add.

25 Q Okay. And what is Exhibit K?

1 A This is the letter apparently sent out by Enrique
2 Palocios to the pool of applicants for jobs for the General
3 Manager position and the schedule of what would happen in
4 the process of hiring.

5 Q And could you tell us how it was this came to
6 appear as an exhibit in the petition?

7 A Again, I believe that some of the inside documents
8 came from Dave Evans, and I believe this was one of them,
9 one of the documents.

10 Q And Exhibit L?

11 A This is a Civil Service description of how
12 employment is processed, how new employees are processed, I
13 believe. A description of the kinds of positions, that's
14 what it is.

15 Q And how did this document come to be a part of the
16 petition, so far as you know?

17 A That, I believe, is in the Civil Service handbook.

18 Q Okay. Exhibit M, could you tell us what that is?

19 A This is a -- this is the document from which Anna
20 Perez was hired..

21 Q And refresh my recollection as to who Anna Perez
22 is?

23 A Anna Perez is a person that was hired at the radio
24 station, she just showed up one day and informed us that she
25 was a new manager at the radio station.

1 Q What was she doing or what was she supposed to do?

2 A I don't know.

3 Q How long was she there?

4 A I think she left in 2000, 2001, something like
5 that, so from 1996 to 2000, 2001, somewhere in there.

6 Q And how did Exhibit M come to be a part of the
7 Petition to Deny?

8 A I believe that may have been Dave, I'm not sure.

9 Q You don't currently recall how it came to be
10 included?

11 A I don't recall how that came to be included.

12 Q Moving on to Exhibit N, although it's not clearly
13 marked, this is what we all believe to be Exhibit N, and
14 could you tell me what that is?

15 A This is the -- I think this is Bill Helgeson's
16 documentation to leave his Civil Service job and take up an
17 appointment.

18 Q And for those of us who are the great unwashed and
19 don't know how SFUSD works, could you explain a little bit
20 more what that means?

21 A Well, I think what this is, is he's getting leave,
22 in a sense, to maintain his status as a Civil Service
23 worker. I'm not sure but I know that this is the report
24 that shows that he now has moved to this higher appointed
25 position, one for which there was no job announcement, no

1 advertisement for it, or anything like that.

2 Q Oh. So, this document that you were looking at,
3 Exhibit N, somehow relates to the EEO matters that the
4 Petition to Deny was talking about?

5 A Yes, right. Exactly.

6 Q And do you know how it is that the, you know,
7 Golden Gate Public Radio came to possess this document?

8 A Again, I don't recall but there were several
9 documents that, as we were formulating the idea to do this
10 petition, Dave was involved in that and I believe Dave had
11 access to a lot of this stuff, where it was and that sort of
12 thing.

13 Q Okay. Exhibit O we've already talked about.
14 Could you tell me what Exhibit P is?

15 A This is a letter from Joanne Mar, this is a letter
16 from Joanne Mar asking that at least the proper processes
17 for hiring be followed.

18 Q And in terms of how this letter came to be
19 included in the petition?

20 A She gave this to us. Joanne gave that to us.

21 Q Okay. And what is Exhibit Q?

22 A This is another one from Joanne. And this is
23 again documenting the fact that the radio station was being
24 poorly managed.

25 Q Right. Well, the document basically speaks for

1 itself, as do most of them, but I mean my question is this
2 came, Exhibit Q came from Joanne?

3 A Came from Joanne, right.

4 Q Exhibit R?

5 A This is one that I wrote, I think I just, I think
6 I went down to the San Francisco Unified School District and
7 asked them who the board members were.

8 Q And the purpose of that was because?

9 A To show that these were the dates, or these were
10 at least the times that a -- soon after an Ownership Report
11 should have been filed.

12 Q Oh, I see. So, the various dates that appear here
13 are supposed to be the dates that these individuals started
14 to work as School Board members, is that it?

15 A Yes.

16 Q Okay. And what is Exhibit S?

17 A This is a memo from Jeff Ramirez to an applicant,
18 to a friend of his, that he was going to hire while skirting
19 the competitive hiring process.

20 Q So, this is somehow related to the EEO aspect of
21 the petition?

22 A EEO, yes.

23 Q And how is it that Golden Gate Public Radio came
24 to possess this document?

25 A From Dave Evans.

1 Q What is Exhibit T?

2 A This is the agreement between the Board of
3 Education and Jerry Jacob, who was the General Manager when
4 I started working at KALW.

5 Q What significance does this document have to the
6 Petition to Deny? It goes on and on and on, 29 pages here.

7 A I don't recall. It's just the entire contract.

8 Q And how did Golden Gate Public Radio come to
9 possess this document?

10 A Again this document was provided by Dave Evans.

11 Q Exhibit U of the Petition to Deny?

12 A This is the contract with Rose Levinson, and the
13 SFUSD.

14 Q And how did Golden Gate Public Radio come to
15 possess this document?

16 A Again, I believe Dave Evans provided this for us.

17 Q Exhibit B?

18 A This is the memo that went out regarding Jerry
19 Jacob, he wasn't fired but his contract was not renewed.

20 Q All right. And how did this document come to be
21 possessed by Golden Gate Public Radio?

22 A This was a general memo, it was sent to all the
23 staff.

24 Q I see. Exhibit W?

25 A This is the agreement between Lynne Merrenbaum

1 (phonetic), and SFUSD, and like Anna Perez she was another
2 person who just showed up at the radio station one day and
3 said I'm the marketing manager or whatever, the underwriting
4 director.

5 Q And how did Golden Gate Public Radio come to
6 possess Exhibit W?

7 A Again, that was from Dave Evans.

8 Q We're actually getting close here, as far as this
9 one goes. Exhibit X?

10 A This is the contract with the person who is the
11 subject of the email or the recipient of that email from
12 Jeff Ramirez, Michael Moon, this is his consulting fee for
13 helping with a fundraiser I imagine.

14 Q And how did Golden Gate Public Radio come to
15 possess this document?

16 A Again, this was provided by Dave Evans.

17 Q Now Exhibit Y we've already talked about?

18 A Right.

19 Q Exhibit Z?

20 A This is the contract between Rose Levinson and the
21 School District, I believe, for the General Manager
22 position.

23 Q How did Golden Gate Public Radio come to possess
24 this document?

25 A Again, Dave Evans provided it to us.

1 Q What is Exhibit AA?

2 A This is the, this is another consulting contract,
3 I believe, between Lynne Merrenbaum and SFUSD.

4 Q And how did Golden Gate Public Radio come to
5 possess this document?

6 A Dave Evans provided it for us.

7 Q Exhibit BB we've already talked about. Finally we
8 get to Exhibit CC, and it purports to be an affidavit from,
9 it looks like Heddy Jacobwitz?

10 A Jacobowitz, Heddy Jacobowitz.

11 Q Okay. I managed to butcher that one. Did you
12 have any role in drafting this document?

13 A I may have. I may have had a role.

14 Q And I guess we'd have to talk to Heddy to get her
15 take on how this came to be?

16 A Yes.

17 Q Now, we have looked at a document, Exhibit E in
18 the Petition to Deny, which was that four page report that
19 Susan Hecht apparently had prepared. And do you have any
20 knowledge as to who actually saw or who was given Exhibit E
21 to look at?

22 A Susan Hecht told me that she gave this document to
23 Jeff Ramirez.

24 Q Did you ever speak with Mr. Ramirez about Exhibit
25 E?

1 A No, I did not.

2 Q Do you have any knowledge as to whether Susan
3 Hecht gave Exhibit E to anyone else in the management of
4 KALW?

5 A I don't.

6 Q Do you have any knowledge as to what station
7 management, in this case Mr. Ramirez, did as a consequence
8 of receiving Exhibit E?

9 A I don't know. I know what he did not do.

10 Q And what was that?

11 A He did not, he didn't take care of business and
12 get the Public File in proper shape.

13 Q Now, in terms of Exhibit E, what, if anything,
14 here references the Public File, if you could help me there,
15 there are four pages here so take a look at it?

16 A Sure. The Ownership Reports. I can't remember if
17 employee reports are actually necessary for a Public File.
18 They may be for EEO. Applications, those are necessary to
19 the FCC. I imagine the Non-Commercial Educational FM
20 Broadcast Station License 1977 may not be need in the Public
21 File anymore. Modification of a Construct Permit in '75.
22 Most of the things on here look like things that should be
23 in the Public File, coverage map.

24 Q Now, to your understanding, is this report
25 supposed to reflect what was in the Public File when she

1 looked?

2 A Well, the Public File, this is important to note,
3 the Public File was not organized very well. There were
4 some files, individual files, that were properly labeled and
5 there were others that weren't. There were things that were
6 scattered in it, in other words they weren't together.

7 Q Right. I'm not so much worried about an
8 organizational aspect, just what was in there, is this
9 report supposed to reflect what was in the file at the time
10 she looked?

11 A I think this report reflects what was in the
12 drawer that she looked at, where the Public File was
13 scattered in with other things.

14 Q In other words, conceivably there could have been
15 documents that would have been associated with the station
16 Public File that simply weren't in the file at the moment
17 that she looked?

18 A Right.

19 Q We don't know one way or the other yet, would that
20 be your understanding?

21 A My understanding, well, having looked at the
22 Public File about, you know, in the same period of time, my
23 understanding, in looking at the Public File, is that it was
24 very difficult to ascertain what order things were in, in
25 that file. It was just one drawer. And I imagine what she

1 did was she opened that drawer and said here's where -- they
2 told her here's where the Public File is, and perhaps gave
3 her some sort of guide at least to what she should find in
4 there, and she probably went through every single piece of
5 paper and said this is what's in that drawer, where the
6 Public File is, being told that's the Public File.

7 Q Looking at Exhibit E, is that consistent or not
8 consistent with what you found when you looked at the Public
9 File in July of 1997?

10 A Well, zeroing in on the things that are most
11 important, it is consistent. And I don't recall whether
12 there was three letters dated from '87, '90 or '90 (sic), I
13 don't recall that.

14 Q Right. Okay, focusing on the Ownership Reports?

15 A On the Ownership Reports it seems accurate to me.

16 Q And what about the Programs Issues List?

17 A Programs Issues List, that, let's see here, well,
18 it's hard to know because she's got it divided into two
19 things, Program List and then Program Problem, I think that
20 means Problems in Programs, and it says there are partials
21 for '97 back to '89. And then the Program List is empty.
22 And that would fall into, you know, my perception that maybe
23 people had added to it and created a separate folder for
24 Programs and Issues, on top of another one that had a
25 different name that was the same thing, and that sort of

1 thing.

2 Q Let me see what you're referring to here?

3 A So, you have this here.

4 Q Okay. The problem is that there's something
5 that's blotted out by a punch hole.

6 MS. REPP: It looks like 'Problems'.

7 MR. SHOOK: Okay. 'Problems in Programs Spring
8 '92". And so -- okay, let's see. Let's try to make this a
9 little bit easier here.

10 BY MR. SHOOK:

11 Q So, this is on now page three of Exhibit E?

12 A Right.

13 Q And the heading is 'Problems in Programs Spring
14 '92"?

15 A Uh-hum.

16 Q And then what follows is -- what does this mean,
17 to your understanding?

18 A I imagine these are the quarters, Winter and
19 Spring. The year 1991 is complete, which would stand to
20 reason because I think that was the last year of the
21 previous application period. And then from 1997 back to
22 1989 there are partials. I don't know exactly what partials
23 mean.

24 Q When you looked at the Public File, which occurred
25 apparently sometime after this report, you know, the time

1 that she inspected the Public File herself and reviewed the
2 contents, what did you find relative to the Problems in
3 Programs, or Programs Issues List, whatever it was?

4 A After 1992 I believe that was the last year that
5 whoever was taking care of it stopped and I found just that
6 one list of shows from City Visions.

7 Q The Exhibit O that we had looked at before that
8 had the three pages of date, producer and --

9 A Yes.

10 Q -- issue, or whatever it was?

11 A Yes.

12 MR. SHOOK: Do you need to take a drink or do you
13 want to take a break?

14 THE WITNESS: Can I use the restroom real quick?

15 MS. LEAVITT: Sure. We'll take a break.

16 (Off the record at 2:59 p.m.)

17 (Back on the record at 3:24 p.m.)

18 BY MR. SHOOK:

19 Q Okay. We have spoken briefly about Susan Hecht,
20 but I don't think I asked you this question, how many
21 contacts would you say that you had with Susan Hecht over
22 the course of your time at KALW?

23 A Maybe three or four.

24 Q And from your dealings with her, do you have any
25 opinion as to her truthfulness?

1 A She seemed like a very organized person to me.
2 She seemed like perhaps she had been an office worker or had
3 been a professional or something like that. Her approach
4 was serious.

5 Q Well, that may be but in terms of whether or not
6 you had an opinion?

7 A I believe her, I think she's being truthful. I
8 don't think that she made that up.

9 Q By 'that' you're referring to Exhibit E in the
10 Petition to Deny?

11 A Exhibit E, I don't believe that she made that up.
12 I believe that she wrote down exactly what she found in the
13 Public File.

14 Q Do you have any knowledge as to Susan Hecht's
15 reputation as to character?

16 A No, I do not.

17 Q Now, we've also spoken briefly about Mr. Evans,
18 and we went through the circumstances of his death and that
19 he and you were at least part of a group that formed Golden
20 Gate Public Radio. From your dealings with Dave Evans, do
21 you have any opinion as to his truthfulness?

22 A I believe he's being completely truthful.

23 Q Do you have any knowledge as to Dave Evans'
24 reputation as to character?

25 A My personal knowledge with him is that he is very

1 -- he considers it very important to follow the rules.
2 Again, he's a person, he was a persnickety chief engineer.
3 In fact, Dave was so persnickety that he would, if he were
4 there at night at sign-off, he would unplug all the
5 headphones so that they wouldn't just play continuously. I
6 mean that's how persnickety he was.

7 Q And there was a period of time when you interacted
8 with Jeff Ramirez?

9 A A couple of times.

10 Q There was a period of approximately how long when
11 he was your General Manager?

12 A I think he was there maybe a little over a year,
13 year and a half maybe, I'm not sure exactly how long.

14 Q And during that period of time, how much contact
15 would you have with him?

16 A Very little.

17 Q Roughly once every when?

18 A Maybe saying hi in the hallway when I saw him. If
19 I were filling in for somebody on an afternoon shift then I
20 would see him.

21 Q Now, prior to the time the Petition to Deny was
22 filed, did you ever have any conversations with Mr. Ramirez
23 about what you thought the problems at the station were?

24 A No, I didn't. But, I did have a conversation with
25 Jeff Ramirez about a program that, a programming idea that I

1 had when he first came on.

2 Q And what was that all about?

3 A That was about the show that eventually got on the
4 air when Michael Johnson was the General Manager.

5 Q What show was that?

6 A That was Don Giovanni Overdrive.

7 Q Oh, okay. So, that was the show that you spoke
8 with Mr. Ramirez about?

9 A Uh-hum.

10 Q What happened as a result of that conversation
11 with Mr. Ramirez?

12 A I told him that I had this idea for a show and
13 it's one that I had produced in various forms at other radio
14 stations. And, you know, I asked him if I put together a
15 program proposal, a CD and that sort of thing, and I
16 submitted it to him. And he had it for quite awhile and I
17 didn't hear anything, and finally I asked him if he was
18 going to act on it or if it's something that he wanted to
19 do. And he said that, from what I recall, he said that he
20 hadn't really considered it and had other things that were
21 more pressing, so I got it back from him, I got my demo tape
22 back and that was that.

23 Q Oh, did you ask him for it or he just gave it to
24 you?

25 A I asked him for it.

1 Q And then he gave it to you?

2 A Yeah, but it had been awhile though, it wasn't
3 quite, I don't know, if it was three months or four months
4 or whatever, and I hadn't heard anything from him so.

5 Q Now, following the filing of the Petition to Deny,
6 did you have any conversations with Mr. Ramirez about the
7 allegations that were in the petition?

8 A I may have, at a Public Radio Conference held in
9 San Francisco, I saw him in the hall.

10 Q About what time would this have been?

11 A It was in the Spring, I believe, of -- he was gone
12 by that time. I remember that now. It was the Spring of
13 1998 and he was, I think he was gone already, he was working
14 for CBB. So, no, I don't believe I did talk to him about
15 the petition or any of the contents. I didn't believe that
16 Jeff -- I didn't believe that Jeff was acting in good faith.
17 From a certain point in deciding to file that petition, I
18 didn't believe that it was really worth it to talk to him
19 about this stuff.

20 Q Now, in talking with him about the time period
21 that you mentioned, the Spring of 1998, the Petition to Deny
22 has already been filed and to the casual reader of the
23 petition, Golden Gate Public Radio is saying, in so many
24 words, Jeff Ramirez you're a liar. Did that come up in
25 conversation when you spoke with him?

1 A Never, never.

2 Q Did he reflect any anger or take any umbrage at
3 the fact that Golden Gate Public Radio was accusing him of
4 not telling the FCC the truth?

5 A I don't know.

6 Q Have you spoken with him since?

7 A No. I think it's -- I don't know where this came
8 from, I think it's curious that in their opposition they
9 produced a postcard that had like a devil face on it or
10 something and said we have ways of hurting you. I guess
11 implying that I sent it to him, which is totally, you know,
12 that's not my style, I would never do anything like that.
13 No one at GGPR would do anything like that. This is
14 ridiculous. But, I thought it was interesting that they
15 thought that that, whether Jeff was the one that raise it or
16 whatever, in the opposition they felt that was important
17 enough to bring up as meaning something. So, I feel like
18 that, when I saw that, as a reaction I felt like that is one
19 of those circumstantial things that is kind of grasping at
20 straws instead of focusing on the issues, because I believe
21 we brought up issues about the radio station and not about
22 we have ways of getting you and all that sort of thing.
23 Because that to me seemed like an emotional response to
24 something that was not emotional. So, I don't know if that
25 was Jeff Ramirez or who would have brought that up but,

1 obviously it was mailed to him, or whoever made it had
2 Jeff's, you know, name on it or whatever, it was included in
3 there, you know.

4 Q So, from what you're telling me it would be fair
5 to say that you had few contacts with Mr. Ramirez over the
6 period of time when you worked together, and one contact
7 apparently after he left KALW, and that you haven't spoken
8 with him since?

9 A I have not spoken with him since.

10 Q Now, do you have any knowledge as to Mr. Ramirez's
11 reputation as to character?

12 A Based on the documents in the petition, which is a
13 lot of what I have to go on, I believe that if Jeff is not,
14 was not, I shouldn't say is, but was not entirely truthful,
15 was deceptive about the way he was running the radio
16 station, having to do with EEO and other matters at the
17 radio station.

18 Q Now, focus carefully on the question as I'm
19 phrasing it. Do you have any knowledge as to why Mr.
20 Ramirez would simply, you know, why he didn't check the 'no'
21 box instead of the 'yes' box with that question that we
22 looked at, question two, that talked about the contents in
23 the Public File, why in the world would somebody check 'yes'
24 when he could have checked 'no', he should have checked
25 'no', if that's, if all that we've been talking about thus

1 far is true?

2 A He didn't have any experience as a manager, none,
3 from what I've seen. At some point I saw his resume, and I
4 don't know where that went but, at some point I did see his
5 resume. He may have talked about his past jobs, I cannot
6 substantiate where I saw the information but, I can
7 reasonably say that he didn't have any experience managing
8 human beings, for one, much less taking on the processes of
9 managing the radio station and its relationship to the
10 Federal Communications Commission.

11 Q And that's information you derived from looking at
12 a resume of Mr. Ramirez?

13 A Yeah.

14 Q I want to show you a letter that -- actually,
15 before I do that -- I want to show you a document that bears
16 a date of January 20, 1998, and it was filed at the Federal
17 Communications Commission on January 20, 1998. And if you
18 could just scan -- you don't have to scan the entire
19 document but, if you could tell me to your understanding
20 what that document is?

21 A This is the response of SFUSD to the Petition to
22 Deny.

23 Q And at the time that document was filed, on or
24 about the date that that document was filed, did you receive
25 a copy of the document?